



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

AGM/NUC 89-003

July 24, 1989

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
EMERGENCY PREPAREDNESS EXERCISE EXEMPTION REQUEST

Attention: George Knighton

The Sacramento Municipal Utility District (SMUD) hereby applies for an exemption from 10 CFR 50, Appendix E, Section IV.F.2. This exemption would allow SMUD to not perform the annual exercise of the Rancho Seco Emergency Plan for 1989.

We submit the following information on the status of SMUD's Emergency Preparedness program as the basis for the exemption request. The exemption request results from the current transitional mode of Rancho Seco from an operating plant to a plant preparing for decommissioning.

1. The Rancho Seco Emergency Plan exercise program is beginning a new 6-year exercise objective element matrix in coordination with FEMA, state, and county Emergency Plan exercise programs. The last of the objectives from the previous element matrix were completed in 1988.
2. Section IV.F.3 of 10 CFR 50, Appendix E requires that the state and local government Emergency Plans shall be exercised with full or partial participation by these agencies on a biennial basis. This requirement was accomplished in 1988. 1989 is an "off year" for offsite authority participation. The state, counties, and FEMA were contacted regarding our request for this exemption and had no objections.

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3. SMUD performed extremely well in the 1987 and 1988 Emergency Preparedness exercises. No significant outstanding NRC or FEMA exercise Evaluation Findings and no significant outstanding Rancho Seco Emergency Planning group observations remain open.
4. Rancho Seco's 1988 Systematic Assessment of Licensee Performance (SALP) evaluation in the area of Emergency Preparedness resulted in a performance rating of Category 2 with an improving trend.
5. The plant is currently in cold shutdown and will be in this condition or a refueling condition for at least the remainder of 1989, with the reactor scheduled to be defueled toward the end of 1989. The scenario planned for the 1989 exercise is for an operating condition which will not exist in 1989.
6. The Emergency Preparedness Exercise exemption request is for 1989 only. An exercise shall be performed in 1990 which will include offsite agency participation. The 1990 Rancho Seco Emergency Preparedness exercise will reflect the operating condition of the plant. Objectives originally scheduled for the 1989 exercise will be re-evaluated and factored into the remaining 5 years of the 6-year objective element matrix.
7. Quality Assurance Audits of the Emergency Plan in 1988 and 1989 did not disclose any items of significance that indicated degradation of the Emergency Plan.

Because of the excellent performance of the Rancho Seco Emergency Preparedness program over the last 2 years, no outstanding objectives required to be met in 1989, the current transitional operating mode of Rancho Seco, and no requirement for the state, FEMA, and local authorities to participate in the 1989 exercise, SMUD requests your expeditious review of our exemption request.

Members of your staff with questions requiring additional information or clarification may contact Richard Mannheimer at (209) 333-2935, extension 4916.

Sincerely,



Dan R. Keuter
Assistant General Manager
Nuclear

cc: J. B. Martin, NRC, Walnut Creek
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